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BY COURIER

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JUL 1, 1995

Office of the Secretary
Federal Communications Commission
1919 M Street, Room 239
Washington, D.C. 20554

FCC MAIL ROOM

Dear Sirs:

**Subject: Proposed changes of FCC Part 2 and 15 and its
application to personal computers and their peripherals**

The Information Technology Association of Canada (ITAC) respectfully submits the following comments for proposed changes to the FCC authorization process. ITAC is supportive of any process changes which reduce burdensome interventions and assist with leveling the competitive playing field by eliminating barriers to trade.

ITAC supports the move to replace product labeling statements in favour of a smaller product logo which at a minimum will be acceptable among all NAFTA partners. However, ITAC also supports the creation, use and verification to a single international standard and a international method to declare conformance. To that end as future work, we would like to see a single CISPR logo created which would equally be acceptable as any Regional or National logo or product label.

As technology advances, the demand for reduced size of product and components has become paramount. It is extremely difficult and provides no value to require a label, including the FCC ID, or logo on components for every Nation the product may be sold in. A statement in the documentation is sufficient. If it is deemed necessary to apply some form of EMC identification to the product, where space permits, a logo is preferred in place of both the statement and FCC ID. This raises the issue of differentiating between what logo may be used on a final product configuration which has been tested and one which would be applied to an enclosure which only has a DoC as a component. They should be different.

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List A B C D E

ITAC supports the proposed Declaration of Conformity (DoC) and verification process to replace the current lengthy and more expensive Certification process. However, we do not support the DoC requirement for including the test report number and date. This would increase both expense and delay to documentation currently supplied to a family of products as they would need to be uniquely tailored to sub-families. Alternatively the responsible contact name and address should be all that is required in the compliance statement for the final product. Integrators would keep on file the required DoC from their component suppliers. Also flexibility in wording of the FCC compliance statement is also essential to accommodate requirements from many countries with minimum text.

ITAC does not support the two step testing proposal for component assemblies as it provides no additional value of the additional time and expense involved. The assemblies should continue to be tested within a representative system configuration as is done today.

ITAC requests a clarification concerning the intention of 14 day turnaround time of a FCC request for a copy of the DoC. The initial and return mail can often take that long and in some countries, (Mexico and Italy for example) may take twice that long. A longer period is recommended and an indication whether FCC intends this period to be marked from date of sending or receiving the request.

ITAC supports the leveling of the manufacture / supplier playing field by providing a more practical methodology for integrators to build a product from components (such as CPU boards, power supplies and enclosures) with known declared characteristics which allow the integrator to declare conformity for the final product. The current practice has proven to be impractical and far too often ignored by integrators thus creating an unfair advantage against manufactures.

Similarly, DoC for enclosure and power supply assemblies should only need to declare the worst case CPU board configurations they have been tested for. The CPU boards should be tested in both a metallic and non-metallic enclosure as the rests will be significantly different. Any type of 'limiting declarations' unfortunately with today's rapidly advancing technology, may unfairly be limited by the technology available at time of testing. The continuous updating of the DoC will be required to remain current which adds expense. This shortcoming should be considered.

Also, the most common upgrade performed today is the CPU module to existing processor mother boards. It may be worth considering DoC capability to only the CPU module versus module/board combination. This should also be tested in a representative system configuration.

ITAC supports the proposal to divert resources to increased monitoring and field testing for compliance as declared in the DoC reports. This policing will assist with maintaining a level playing field.



ITAC does not support the proposal for mandatory accreditation of a manufacture's test facilities for two reasons. (1) The manufacture's name and reputation are sufficient. (2) Other schemes such as ISO 9000 registration will achieve similar objectives.

We thank you for the opportunity to comment on the proposed changes.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Broadmore', is written over a large, loopy oval shape.

Peter Broadmore
Vice President
Government Relations